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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

Comments
In the matter of
FCC Docket MM 99-25
Proposed Rule
Creation of a Low Power Radio Service

First of all let me say I commend the Federal Communications Commission for your timely action on the proposed new creation of a low power FM broadcast service. I am pleased to have this opportunity to submit my comments on this matter. My comments below are listed by sections noted in 47 CFR Part 73.

I. I applaud your decisions to establish several types of services. I do hope that you will include the "micro-radio" class, which would afford the opportunity for small broadcasters, such as myself to serve smaller communities and neighborhoods, providing vital LOCAL information so often overlooked by the full power stations.

II. B-4/5 No new spectrum need be used. This would create a hardship not only on the broadcaster to obtain special equipment, but listeners as well, with current radios not being able to receive the new frequencies. I would suggest opening channels 201 to 220 to other than non-commercial stations This would allow more low power stations to exsist.

18.- "Micro-radio" service. Many cities could benefit greatly with the establishment of such a service. In our own city of Marysville, Ohio tests have reviled that only a few watts of power could cover the city of license. Be establishing a "micro-radio" service, this will provide the average resident an opportunity of filing for a license to operate a truly "home town" radio station, providing local coverage of town meetings, news, weather and sports. The low power aspect would discourage large stations from wanting to encroach the area, and provide low budget operations to survive. In your section 20 you ask for comments about potential interference. Yes, micro radio stations should be required to protect other micro stations in the same area. Some concern should be made about minimum separation distances.

F. OWNERSHIP AND ELIGIBILITY. My thought on ownership of new LPFM stations should only be allowed to persons NOT connected in any way with any other radio services, newspapers, cable broadcast systems or any other mass media. Give the average American citizen an opportunity to compete in their own home town with the "big money boys".

37.- Unlicensed operators that have been warned by the Commission or ordered off the air and did not comply, should NOT be considered as a worthy candidate for a future license.

41.- LOCAL PROGRAMMING. Local programming is a must. This is the whole purpose for low power broadcasting. I think that all low power stations should produce 100% of their programs on a local basis and not be allowed to re-broadcast from another source.

43.- Micro radio should be as free of un-nessary rules, paper work, logs etc. as much as practical. This will allow the small staff the opportunity to operate their stations in the public interest.

49.- LP-1000 stations should be treated as full power stations (ref) EAS. LP100 or micro class stations will cover very small areas and should be relieved of this burden.

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50.- STATION IDENTIFICATION. LP1000 stations should have some sort of special ID. LP100 or micro stations really don't need any special ID. Perhaps only at sign on and sign off location, ownership or something of that nature need be announced.

TYPE ACCEPTANCE STANDARDS. It is my opinion that the proposed LP1000 and LP100 stations use only type accepted RF amplifiers. Micro radio systems should not be subject to this rule. For powers up to 10 watts output, most micro systems would use an FM excited with no RF amplifier. In this case the exciter should be of commercial design and manufactured by any commercial company normally providing such equipment to the broadcast community. Most exciters on the market today do not have type acceptance requirements. However they are made for commercial broadcast use and are of high quality. Again, this will allow the micro broadcaster the opportunity to get on the air quickly and at a minimum of cost and yet provide for a quality signal and control of assigned frequency.

Respectfully submitted:

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